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MCDERMOTT, WILL & EMERY

October 9, 2003

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation: Service Rules for Advanced Wireless
Services in the 1.7 and 2.1 GHz Bands, WT Docket No. 02-353**

Dear Ms. Dortch:

This is to notify you that undersigned counsel to Southern Communications Services, Inc., spoke by telephone this morning with Jared Carlson, of the Wireless Telecommunications Bureau, to discuss Southern's position on the issues in the above-referenced proceeding. Specifically, Southern recommended that licensing areas and auctioning rules be designed such that there are two separate auctions, with the first auction consisting of large geographic area licenses suitable for nationwide or large regional coverage, and the second consisting of licenses for smaller geographic areas such as Metropolitan Statistical Areas (MSAs) and Rural Service Areas (RSAs). Southern explained that because larger carriers tend to drive the equipment market in auctioned spectrum bands, having sufficient time between auctions of larger and smaller license areas would greatly benefit smaller carriers by allowing them to take into account the potential for economies of scale in equipment availability. Sequencing of auctions in this manner would give regional and smaller carriers an opportunity to better formulate their business plans and bidding strategies, thereby encouraging greater participation in the auction for the smaller geographic area licenses.

In accordance with the Commission's rules, a copy of this *ex parte* notice is being filed electronically for inclusion in the record of this proceeding.

Very truly yours,

/s/ Jeffrey L. Sheldon

Jeffrey L. Sheldon

cc: Jared Carlson